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Andrea Leshak, Esq.
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U.S. Environmental Protection Agency, Region 2
290 Broadway, 17th Floor
New York, New York 10007-1866
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Re: Request for Information to Colgate-Palmolive Company Pursuant to Section 104(e) of the Comprehensive Environmental Response, Compensation, and Liability Act, 42 U.S.C. § 9604(e), PROTECO Site, Peñuelas, Puerto Rico

Dear Ms. Leshak:

I am writing to follow up on our conversation of May 10, 2021 regarding EPA's April 5, 2021 CERCLA 104(e) request for information ("104(e) request") to Colgate-Palmolive Company ("Colgate") relating to the PROTECO Site in Puerto Rico (the "Site"). We discussed the option for Colgate to provide a report on its investigation in response to the 104(e) request with a view toward withdrawing the request.

In addition to the 104(e) request, USEPA provided a 19 page handwritten document that USEPA has stated is a waste-in list for Site ("List"). The List appears to have dates on it ranging from 1985-88. While much of the document is illegible, it appears to list three shipments of "Process Water" and one shipment each of "Waste Speed Stick Deodorant" and "Waste Propylene Glycol" associated with the Mennen de Puerto Rico Ltd. Juncos and Las Piedras facilities (the "Facilities"). While other, non-Mennen entries on the List indicate that the wastes are hazardous, there is no information to suggest that the Mennen wastes contained any hazardous substances (as that term is defined in CERCLA), or any hazardous wastes (as that term is defined in RCRA).

Colgate conducted a thorough search for documents that could shed light on the types and volumes of wastes that were generated at the Facilities. Our search included a search for waste characterization

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and disposal documents, as well as documents related to the Facilities' manufacturing processes that might provide information on the composition of process water disposed of by the Facilities. Our search included reviews of electronic and paper documents, including documents in off-site storage. We also spoke with current Colgate employees who potentially had knowledge of the matters covered by the 104(e) request. We have not found any documents indicating that process water generated at the Facilities contained hazardous substances. In addition, on information and belief, Speed Stick Deodorant manufactured at the Facilities did not contain any hazardous substances. A Safety Data Sheet ("SDS") for that product is attached. While Section 3 of the SDS lists propylene glycol and sodium stearate as "hazardous components" under the OSHA Hazard Communication Standard, those substances are not CERCLA hazardous substances. Both substances are commonly used in cosmetic products, and propylene glycol is also approved for use in food and pharmaceutical products. Finally, while the attached SDS revision is dated 2016, it is our understanding that the Speed Stick products manufactured at the Facilities in the 1988 time period had a similar composition, and did not contain any hazardous substances.

Given that there is no evidence that hazardous substances or wastes were sent to the Site from the Mennen Facilities, we believe there is no basis for holding Colgate liable under CERCLA, and we request that USEPA withdraw its 104(e) request to Colgate. We will provide any additional relevant information that becomes available and supplement this submission accordingly. Neither the fact of this response, nor the substance of this response, shall be construed in any way as an admission of any liability, or as a waiver of Colgate's rights, claims or defenses, under CERCLA or any other applicable law.

Thank you very much for the courtesies extended to date. I look forward to your response.

Very truly yours,

/s/ Sabrina Mizrachi
Chief Litigation Counsel
Colgate-Palmolive Company

MENNEN SPEED STICK DEODORANT REGULAR

This industrial Safety Data Sheet is not intended for consumers and does not address consumer use of the product. For information regarding consumer applications of this product, refer to the product label.

Version 1.1

SDS Number: 660000000166

Revision Date: 2016/04/05

SECTION 1. IDENTIFICATION

Product name : MENNEN SPEED STICK DEODORANT REGULAR

Product code : 200000020498

Material : B0650113M

Manufacturer or supplier's details

Company : Colgate-Palmolive Co
300 Park Avenue
New York, NY 10022

Telephone : US: Consumer Affairs - 1-800-468-6502

Emergency telephone number : For emergencies involving spill, leak, fire, exposure or accident call CHEMTREC (24hr) at (800) 424-9300 or (703) 527-3887.

Global-CHEMTREC- +1 703-741-5970

Medical Emergency (24HR): For MEDICAL EMERGENCIES involving this product call: (888) 489-3861

Recommended use of the chemical and restrictions on use

Recommended use : A formulated deodorant /antiperspirant.

SECTION 2. HAZARDS IDENTIFICATION

GHS Classification

Not a hazardous substance or mixture.

GHS Label element

Not a hazardous substance or mixture.

Other hazards

None known.

SECTION 3. COMPOSITION/INFORMATION ON INGREDIENTS

Hazardous components

Chemical Name	CAS-No.	Concentration (% w/w)
PROPYLENE GLYCOL	57-55-6	>= 50 - < 70
SODIUM STEARATE	822-16-2	>= 5 - < 10

SECTION 4. FIRST AID MEASURES

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General advice	: No hazards which require special first aid measures.
If inhaled	: Move to fresh air in case of accidental inhalation of dust or fumes from overheating or combustion. If symptoms persist, call a physician.
In case of skin contact	: Take off contaminated clothing and shoes immediately. Wash off with soap and plenty of water.
In case of eye contact	: Flush eyes with water as a precaution. Remove contact lenses. Protect unharmed eye. Keep eye wide open while rinsing.
If swallowed	: Clean mouth with water and drink afterwards plenty of water. Do not give milk or alcoholic beverages. Never give anything by mouth to an unconscious person.
Most important symptoms and effects, both acute and delayed	: None known.

SECTION 5. FIREFIGHTING MEASURES

Suitable extinguishing media	: Use extinguishing measures that are appropriate to local circumstances and the surrounding environment.
Hazardous combustion products	: No hazardous combustion products are known
Further information	: Standard procedure for chemical fires.
Special protective equipment for firefighters	: In the event of fire, wear self-contained breathing apparatus.

SECTION 6. ACCIDENTAL RELEASE MEASURES

Personal precautions, protective equipment and emergency procedures	: Avoid dust formation.
Environmental precautions	: No special environmental precautions required.
Methods and materials for containment and cleaning up	: Neutralise with acid. Sweep up and shovel. Keep in suitable, closed containers for disposal.

SECTION 7. HANDLING AND STORAGE

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- Advice on protection against fire and explosion : Avoid dust formation. Provide appropriate exhaust ventilation at places where dust is formed.
- Advice on safe handling : For personal protection see section 8.
No special handling advice required.
- Conditions for safe storage : Keep container tightly closed in a dry and well-ventilated place.
- Materials to avoid : No special restrictions on storage with other products.

SECTION 8. EXPOSURE CONTROLS/PERSONAL PROTECTION**Components with workplace control parameters**

Components	CAS-No.	Value type (Form of exposure)	Control parameters / Permissible concentration	Basis
PROPYLENE GLYCOL	57-55-6	TWA	10 mg/m ³	US WEEL
SODIUM STEARATE	822-16-2	TWA	10 mg/m ³	ACGIH

Personal protective equipment

- Respiratory protection : No personal respiratory protective equipment normally required.
- Hand protection
- Remarks : For prolonged or repeated contact use protective gloves.
- Eye protection : Safety glasses
- Skin and body protection : Protective suit
- Hygiene measures : General industrial hygiene practice.

SECTION 9. PHYSICAL AND CHEMICAL PROPERTIES

- Appearance : Solid
- Colour : green
- pH : 10
- Flash point : > 200 °F
- Density : 1.02 g/cm³

SECTION 10. STABILITY AND REACTIVITY

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Reactivity	: Stable under recommended storage conditions.
Chemical stability	: No decomposition if stored and applied as directed.
Possibility of hazardous reactions	: No hazards to be specially mentioned.
Conditions to avoid	: No data available

SECTION 11. TOXICOLOGICAL INFORMATION**Acute toxicity**

Not classified based on available information.

Product:

Acute oral toxicity : Acute toxicity estimate: > 5,000 mg/kg
Method: Calculation method

Acute dermal toxicity : Acute toxicity estimate: > 5,000 mg/kg
Method: Calculation method

Components:**PROPYLENE GLYCOL:**

Acute oral toxicity : LD50 (Rat): 22,000 mg/kg

Acute inhalation toxicity : LC50 (Rabbit): > 317,042 mg/l
Exposure time: 2 h
Test atmosphere: No information available.
Method: No information available.

Acute dermal toxicity : LD50 (Rabbit): > 5,000 mg/kg
Method: No information available.

SODIUM STEARATE:

Acute oral toxicity : > 5,000 mg/kg

Acute inhalation toxicity : Remarks: No data available

Acute dermal toxicity : > 2,000 mg/kg

Skin corrosion/irritation

Not classified based on available information.

Product:

Remarks: According to the classification criteria of the European Union, the product is not considered as being a skin irritant.

Components:**PROPYLENE GLYCOL:**

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Result: No skin irritation

SODIUM STEARATE:

Result: No skin irritation

Serious eye damage/eye irritation

Not classified based on available information.

Product:

Remarks: According to the classification criteria of the European Union, the product is not considered as being an eye irritant.

Components:

PROPYLENE GLYCOL:

Result: No eye irritation

SODIUM STEARATE:

Result: Irritation to eyes, reversing within 21 days

Respiratory or skin sensitisation

Skin sensitisation: Not classified based on available information.

Respiratory sensitisation: Not classified based on available information.

Product:

Remarks: No data available

Components:

PROPYLENE GLYCOL:

Exposure routes: Inhalation

Remarks: No data available

Exposure routes: Dermal

Result: Does not cause skin sensitisation.

SODIUM STEARATE:

Exposure routes: Inhalation

Remarks: No data available

Exposure routes: Dermal

Remarks: No data available

Germ cell mutagenicity

Not classified based on available information.

Carcinogenicity

Not classified based on available information.

IARC

No component of this product present at levels greater than or equal to 0.1% is identified as probable, possible or confirmed human carcinogen by IARC.

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OSHA

No component of this product present at levels greater than or equal to 0.1% is identified as a carcinogen or potential carcinogen by OSHA.

NTP

No component of this product present at levels greater than or equal to 0.1% is identified as a known or anticipated carcinogen by NTP.

Reproductive toxicity

Not classified based on available information.

STOT - single exposure

Not classified based on available information.

STOT - repeated exposure

Not classified based on available information.

Aspiration toxicity

Not classified based on available information.

Further information**Product:**

Remarks: This product has not been tested as a whole. However, this formula was reviewed by expert toxicologists in the Product Safety Assurance Department of Colgate-Palmolive and is determined to be safe for its intended use. This review has taken into consideration available safety-related information including information on individual ingredients, similar formulas and potential ingredient interactions. This review is a component of the hazard determination used to prepare the statements in Section 3 of the SDS.

SECTION 12. ECOLOGICAL INFORMATION

The product has not been tested as a whole for environmental toxicity. However, environmental information on the ingredients in this product have been reviewed by the Environmental, Health and Safety group of Colgate-Palmolive and determined to have an acceptable environmental profile. This evaluation is based on available information on individual ingredients, interactions of ingredients, and similar ingredients. Biodegradability claims are supported by data on ingredients (i.e., surfactants are biodegradable) or testing conducted on the final product (i.e., This product is biodegradable).

SECTION 13. DISPOSAL CONSIDERATIONS**Disposal methods**

Waste from residues : Offer surplus and non-recyclable solutions to a licensed disposal company.

Contaminated packaging : Empty remaining contents.
Empty containers should be taken to an approved waste handling site for recycling or disposal.

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SECTION 14. TRANSPORT INFORMATION

DOT : Not regulated.

TDG : Not regulated.

IATA : Not regulated.

IMDG : Not regulated.

ADR : Not regulated.

International Regulation**Transport in bulk according to Annex II of MARPOL 73/78 and the IBC Code**

Not applicable for product as supplied.

National Regulations**SECTION 15. REGULATORY INFORMATION****EPCRA - Emergency Planning and Community Right-to-Know Act****CERCLA Reportable Quantity**

This material does not contain any components with a CERCLA RQ.

SARA 304 Extremely Hazardous Substances Reportable Quantity

This material does not contain any components with a section 304 EHS RQ.

SARA 311/312 Hazards : No SARA Hazards

SARA 302 : No chemicals in this material are subject to the reporting requirements of SARA Title III, Section 302.

SARA 313 : This material does not contain any chemical components with known CAS numbers that exceed the threshold (De Minimis) reporting levels established by SARA Title III, Section 313.

Clean Air Act

This product neither contains, nor was manufactured with a Class I or Class II ODS as defined by the U.S. Clean Air Act Section 602 (40 CFR 82, Subpt. A, App.A + B).

This product does not contain any hazardous air pollutants (HAP), as defined by the U.S. Clean Air Act Section 12 (40 CFR 61).

This product does not contain any chemicals listed under the U.S. Clean Air Act Section 112(r) for Accidental Release Prevention (40 CFR 68.130, Subpart F).

The following chemical(s) are listed under the U.S. Clean Air Act Section 111 SOCM I Intermediate or Final VOC's (40 CFR 60.489):

PROPYLENE GLYCOL 57-55-6

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Clean Water Act

This product does not contain any Hazardous Substances listed under the U.S. CleanWater Act, Section 311, Table 116.4A.

This product does not contain any Hazardous Chemicals listed under the U.S. CleanWater Act, Section 311, Table 117.3.

This product does not contain any toxic pollutants listed under the U.S. Clean Water Act Section 307

US State Regulations**Massachusetts Right To Know**

No components are subject to the Massachusetts Right to Know Act.

Pennsylvania Right To Know

PROPYLENE GLYCOL	57-55-6	50 - 70 %
WATER	7732-18-5	20 - 30 %
SODIUM STEARATE	822-16-2	5 - 10 %

New Jersey Right To Know

PROPYLENE GLYCOL	57-55-6	50 - 70 %
WATER	7732-18-5	20 - 30 %
SODIUM STEARATE	822-16-2	5 - 10 %

TSCA list

No substances are subject to a Significant New Use Rule.

No substances are subject to TSCA 12(b) export notification requirements.

SECTION 16. OTHER INFORMATION**Full text of other abbreviations**

(Q)SAR - (Quantitative) Structure Activity Relationship; ASTM - American Society for the Testing of Materials; bw - Body weight; DIN - Standard of the German Institute for Standardisation; ECx - Concentration associated with x% response; ELx - Loading rate associated with x% response; EmS - Emergency Schedule; ErCx - Concentration associated with x% growth rate response; GHS - Globally Harmonized System; IARC - International Agency for Research on Cancer; IATA - International Air Transport Association; IBC - International Code for the Construction and Equipment of Ships carrying Dangerous Chemicals in Bulk; IC50 - Half maximal inhibitory concentration; ICAO - International Civil Aviation Organization; IMDG - International Maritime Dangerous Goods; IMO - International Maritime Organization; ISO - International Organisation for Standardization; LC50 - Lethal Concentration to 50 % of a test population; LD50 - Lethal Dose to 50% of a test population (Median Lethal Dose); MARPOL - International Convention for the Prevention of Pollution from Ships; n.o.s. - Not Otherwise Specified; NO(A)EC - No Observed (Adverse) Effect Concentration; NO(A)EL - No Observed (Adverse) Effect Level; NOELR - No Observable Effect Loading Rate; OECD - Organization for Economic Co-operation and Development; OPPTS - Office of Chemical Safety and Pollution Prevention; PBT - Persistent, Bioaccumulative and Toxic substance; REACH - Regulation (EC) No 1907/2006 of the European Parliament and of the Council concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals; SADT - Self-Accelerating Decomposition Temperature; SDS - Safety Data Sheet; UN - United

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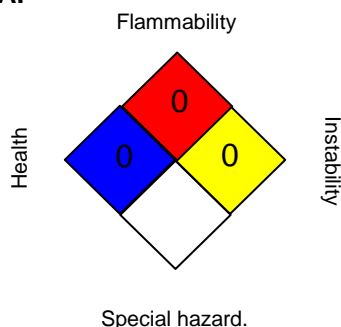
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Nations; vPvB - Very Persistent and Very Bioaccumulative; DSL - Domestic Substances List (Canada); KECI - Korea Existing Chemicals Inventory; TSCA - Toxic Substances Control Act (United States); AICS - Australian Inventory of Chemical Substances; IECSC - Inventory of Existing Chemical Substances in China; ENCS - Existing and New Chemical Substances (Japan); ISHL - Industrial Safety and Health Law (Japan); PICCS - Philippines Inventory of Chemicals and Chemical Substances; NZIoC - New Zealand Inventory of Chemicals; TCSI - Taiwan Chemical Substance Inventory; CERCLA - Comprehensive Environmental Response, Compensation, and Liability Act; DOT - Department of Transportation; EHS - Extremely Hazardous Substance; HMIS - Hazardous Materials Identification System; MSHA - Mine Safety and Health Administration; NFPA - National Fire Protection Association; RCRA - Resource Conservation and Recovery Act; RQ - Reportable Quantity; SARA - Superfund Amendments and Reauthorization Act; CMR - Carcinogen, Mutagen or Reproductive Toxicant; GLP - Good Laboratory Practice; ERG - Emergency Response Guide; NTP - National Toxicology Program; UNRTDG - United Nations Recommendations on the Transport of Dangerous Goods

Further information

NFPA:



HMIS III:

HEALTH	0
FLAMMABILITY	0
PHYSICAL HAZARD	0

0 = not significant, 1 = Slight,
2 = Moderate, 3 = High
4 = Extreme, * = Chronic

Revision Date : 2016/04/05

The information provided in this Safety Data Sheet is correct to the best of our knowledge, information and belief at the date of its publication. The information given is designed only as a guidance for safe handling, use, processing, storage, transportation, disposal and release and is not to be considered a warranty or quality specification. The information relates only to the specific material designated and may not be valid for such material used in combination with any other materials or in any process, unless specified in the text.

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